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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Intel Corporation
Petitioner

v.

VLSI Technology, LLC
Patent Owner

Case IPR2019-01196

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,246,027
CHALLENGING CLAIMS 1-3, 5-12, AND 18-20**

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I. INTRODUCTION

U.S. Patent No. 7,246,027 (“’027 patent”) claims to optimize power consumption in an integrated circuit by adjusting a DC-to-DC converter based on certain characteristics sensed during operation. But the claimed invention merely uses known methods to adjust power supplies, as disclosed by U.S. Patent Nos. 6,933,869 (“Starr”), 7,577,859 (“Bilak”), and 7,583,555 (“Kang”)—none of which was before the Patent Office during prosecution. Because challenged claims 1-3, 5-12, and 18-20 are obvious combinations of Starr and Bilak (Ground 1), and of Starr, Bilak, and Kang (Ground 2), Petitioner respectfully requests cancellation of those claims.

II. MANDATORY NOTICES

A. Real Party-in-Interest

Intel Corporation is the real party-in-interest.

B. Related Matters

VLSI Technology, LLC (“Patent Owner”) has asserted the ’027 patent against Intel in *VLSI Technology LLC v. Intel Corporation*, C.A. No. 18-966-CFC (Del.).

C. Counsel:

Lead Counsel: Dominic Massa (Registration No. 44,905)

Backup Counsel: Richard Goldenberg (Registration No. 38,895)

Backup Counsel: Daniel Williams (Registration No. 45,221)

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Petitioner consents to email delivery on lead and backup counsel.

III. CERTIFICATION OF GROUNDS FOR STANDING

Petitioner certifies pursuant to Rule 42.104(a) that the patent for which review is sought is available for *inter partes* review and Petitioner is not barred or estopped from requesting *inter partes* review challenging the claims on the grounds identified in this Petition.

The '027 patent is one of numerous patents asserted by VLSI in multiple district court jurisdictions. Patent Owner asserted four other patents in the parallel

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